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| UNITED STATES OF AMERICA |) | |
| |) | |
| |) | |
| V. |) | |
| |) | Case No.: 3:18-cr-000025-03 |
| THOMAS WALTER GILLEN, |) | |
| Defendant. |) | |

The Court has requested supplemental information regarding the release plan and proposed conditions of release to support Mr. Gillen's motion for release pending appeal.

Mr. Gillen proposes release to the custody of his father at his home in Torrance, California. Mr. Gillen's father, Mr. James Gillen, testified at the sentencing hearing on July 19, 2019. Mr. James Gillen displayed a notable interest in his son's well-being and future. It is reasonable to conclude from Mr. Gillen's testimony that he has played a large role in his son's life and remains keenly interested in his future. It is noteworthy that Mr. Gillen's mother, also of Torrance, California, was present in the courtroom for the sentencing hearing.

Mr. Gillen proposes to return to his employment at The New Generation Engineering and Construction Company in Gardena, California. Mr. Gillen anticipates that he would return to full-time employment. Mr. Gillen does not have any pressing travel needs outside of central California and accordingly reasonable travel restrictions imposed by the Court or by a probation office would not prove unduly burdensome. Home confinement with or without electronic monitoring is acceptable to Mr. Gillen. If this condition is imposed, Mr. Gillen requests release for his employment, religious services, and any regular or necessary medical appointments or medical requirements.

THOMAS WALTER GILLEN

Respectfully submitted,

S/ D.A. Eustis
By: _____
Of Counsel

David A. Eustis
VSB # 48009
Eustis & Graham, PC
P.O. Box 2195
609 East High Street
Charlottesville VA 22902
Tel: 434-293-9900
Fax: 434-293-999

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system that will send notification of such filing to the following person as well as all other counsel of record.

Mr. Christopher Kavanaugh, Esq.
Assistant United States Attorney
Federal Building
U.S. Courthouse
255 West Main Street,
Charlottesville, VA 22901

S/ D.A. Eustis

David A. Eustis
Eustis & Graham, PC
VSB # 48009
P.O. Box 2195
609 E. High Street
Charlottesville VA 22902
Tel: 434-293-9900
Fax: 434-293-9996
Eustisandgrahamlaw@earthlink.net